EXHIBIT A

FIRST JUDICIAL DISTRICT OF PENNSYLVANIA and Attested by the COURT OF COMMON PLEAS OF PHILADELPHIA COURT OF COMMON PLEAS OF PHILADELPHIA COURT OF THE STATE OF THE

BETHANN MORRISON

Plaintiff,

V.

TEMPLE UNIVERSITY and HOSEA H. HARVEY, III

Defendants

COURT OF COMMON PLEAS PHILADELPHIA COUNTY, PA

CIVIL ACTION--LAW

MAY TERM 2020 NO. 00768

JURY TRIAL DEMAND

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint of for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

Philadelphia Bar Association Lawyer Referral and Information Service One Reading Center Philadelphia, Pennsylvania 19107 (215) 238-6333 TTY (215) 451-6197

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascentar una comparencia escrita o en persona o con un abogado y, entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decider a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

Lleve esta demanda a un abogado immediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

Asociacion De Licenciados De Filadelfia Servicio De Referencia E Informacion Legal One Reading Center Filadelfia, Pennsylvania 19107 (215) 238-6333 TTY (215) 451-6197

Case ID: 20050076k

BETHANN MORRISON

Plaintiff,

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TEMPLE UNIVERSITY and HOSEA H. HARVEY, III

Defendants.

COURT OF COMMON PLEAS PHILADELPHIA COUNTY, PA

CIVIL ACTION-LAW

MAY TERM 2020 NO. 00768

JURY TRIAL DEMAND

COMPLAINT - CIVIL ACTION

Plaintiff BethAnn Morrison, *pro se*, brings this action against Defendants Temple
University ("Temple" or "the University") and Professor Hosea H. Harvey, III ("Professor Harvey") and on information and belief avers the following:

INTRODUCTION

- 1. For four years while Plaintiff was a student at Temple University, Professor Hosea H. Harvey, III engaged in an escalating pattern of sexual harassment that culminated in the sexual assault, assault and battery, and false imprisonment of Plaintiff on May 15-16, 2018.
- 2. Professor Harvey forced Plaintiff to ingest an unknown substance that rendered her unable to repel his sexual advances and escape from the room in which he held her.
- 3. Professor Harvey engaged in sexual acts and sexual intercourse with Plaintiff without her consent.
- 4. Following the sexual assault by Professor Harvey, Plaintiff filed a Title IX complaint against Professor Harvey at Temple University.

- 5. When Plaintiff refused to withdraw her Title IX complaint at Professor Harvey's request, Professor Harvey retaliated against Plaintiff by making untrue and derogatory comments about Plaintiff to the Pennsylvania Bar Examiners, which resulted in Plaintiff being delayed admission to the Pennsylvania Bar for an additional eight months after she passed the Pennsylvania Bar Examination.
- 6. As a result of Professor Harvey's conduct, Plaintiff suffered great physical, emotional, and psychological harm that severely impacted Plaintiff's daily life and career.
- 7. Plaintiff brings this action to recover compensatory and punitive damages for the needless and cruel harm that has been visited on her by Professor Harvey.

PARTIES Temper Underwine by Section Cartinate

- 8. Plaintiff BethAnn Morrison is an adult individual who currently resides in Philadelphia, Pennsylvania.
- 9. Hosea H. Harvey, III is an adult individual who, at all time relevant to the incidents alleged in this complaint, resided in Philadelphia, Pennsylvania and was employed as a Professor in Philadelphia, Pennsylvania at Temple University. He currently resides at 256 E. Roanoke Street, Seattle, WA 98102.
- Temple University is an institution of higher education located in Philadelphia,

 Pennsylvania and was the employer of Professor Harvey at all times relevant to the claims of this complaint.
- 11. Any and all claims between Plaintiff and Temple University arising from the circumstances set forth in this complaint have been resolved to the satisfaction of Plaintiff and Temple University alike. Plaintiff and Temple University have jointly signed and filed a stipulation acknowledging the settlement of all outstanding issues between them and seeking to

have Temple University removed as a Defendant in this action. The parties respectfully await entry of an order by this Honorable Court to effectuate same.

JURISDICTION AND VENUE

- 12. This Court has jurisdiction over this action as it is a court of general jurisdiction in the Commonwealth of Pennsylvania.
- 13. This Court has personal jurisdiction over Professor Harvey under 42 Pa.C.S.A. §5322. Professor Harvey had substantial contacts with this jurisdiction at the time of the incidents alleged herein, including being domiciled in Philadelphia, Pennsylvania and employed in Philadelphia, Pennsylvania by Temple University.
- 14. This Court has personal jurisdiction over Temple University because Temple University is domiciled in Pennsylvania and conducts business there.
- 15. Venue is proper in Philadelphia County, Pennsylvania because the injuries for which Plaintiff seeks redress were inflicted while Defendants were domiciled and conducting business in Philadelphia, Pennsylvania. Plaintiff was also domiciled in Philadelphia, Pennsylvania at all times relevant to this complaint and suffered injuries arising from the Defendant Harvey's conduct within the Commonwealth of Pennsylvania.

JURY DEMAND

16. Plaintiff demands a trial by jury in this action

FACTUAL BACKGROUND

- 17. Plaintiff hereby incorporates by reference the prior paragraphs of this Complaint as though fully set forth at length.
- 18. In 2010, Temple University hired Professor Harvey to serve as an Assistant Professor in the Beasley School of Law.

- 19. In August 2014, Plaintiff began a four-year juris doctorate program in the evening division of Temple University's Beasley School of Law.
- In August 2014, Temple Law School personnel assigned Plaintiff to Professor
 Harvey's class for instruction in contract law.
 - A. History of Sexual Harassment of Plaintiff by Professor Harvey
- 21. In October 2014, Plaintiff visited Professor Harvey during his office hours to discuss a potential summer internship opportunity.
- 22. At that meeting, Professor Harvey steered the conversation with Plaintiff away from Plaintiff's professional pursuits and toward Plaintiff's personal life, particularly Plaintiff's pending divorce.
- 23. Professor Harvey urged Plaintiff to return to his office hours for additional advice concerning her divorce and family situation.
- 24. In November 2014, when Plaintiff returned to see Professor Harvey during his office hours as he directed, Professor Harvey sought and obtained Plaintiff's private cell phone number and email address.
- 25. From November 2014 through May 2018, in person and via text message, Professor Harvey repeatedly requested dates, sexual favors, and pictures from Plaintiff.
- 26. Professor Harvey made these requests for dates, sexual favors, and pictures from Plaintiff while he was employed by Temple University to educate Plaintiff in contract law and assess her fitness to receive her juris doctorate degree.
- 27. As a term of his employment, Professor Harvey was obligated to provide educational services to students in a manner that complied with Title IX of the Education

Amendments of 1972, which prohibits sex discrimination in educational programs that receive federal funds.

- 28. Temple University provides educational programs that receive federal funds.
- 29. Plaintiff filed a Title IX complaint against Professor Harvey on May 23, 2018.
- 30. A Title IX investigation into complaints made by Plaintiff against Professor

 Harvey found that Professor Harvey "more likely than not" sexually harassed Plaintiff in

 violation of Temple University's Policy of Preventing and Addressing Sexual Harassment while
 she was a student at Temple University.
- Advisor to the President for Equity, Diversity & Inclusion, referred the matter of Professor

 Harvey's violation of Temple University's policy to the Law School Dean for disciplinary

 proceedings in March 2019.
- 32. Professor Harvey resigned his lifetime tenured position as professor at Temple University rather than proceed with a hearing before Temple University's Law School disciplinary committee.
 - B. Sexual Assault of Plaintiff by Professor Harvey on May 15-16, 2018
- 33. On or about May 8, 2018, Professor Harvey invited Plaintiff to meet him for dinner and dancing on May 15, 2018 in Atlantic City, New Jersey, where the New Jersey State Bar Association was hosting its annual meeting.
- 34. Plaintiff accepted Professor Harvey's invitation.
- 35. Plaintiff met Professor Harvey at Harrah's Hotel and Casino in Atlantic City,
 New Jersey at approximately 8:40 p.m. on May 15, 2018.
- 36. Professor Harvey had a drink waiting for Plaintiff when she arrived.

- 37. Plaintiff consumed the drink Professor Harvey provided to her.
- 38. Within minutes of consuming the beverage, Plaintiff experienced difficulty speaking and moving voluntarily.
- 39. Plaintiff was overtaken with the sensation that she was floating outside of her body and did not have control of her physical being.
- 40. Plaintiff's condition continued to deteriorate while she and Professor Harvey had dinner at a restaurant located inside Harrah's Hotel and Casino, with Plaintiff reversing normal grammatical word order and struggling to converse with Professor Harvey and the restaurant server.
- 41. When dinner concluded, Professor Harvey asked Plaintiff is she wanted to gamble on the casino floor for a while.
 - 42. Plaintiff told Professor Harvey she was not feeling well and needed to sit down.
 - 43. Professor Harvey took Plaintiff to a suite he had reserved in Harrah's Hotel.
- 44. Once inside the hotel room, Plaintiff's condition continued to deteriorate and Plaintiff became less communicative and less able to move on her own volition.
- 45. Professor Harvey then became very aggressive with Plaintiff, forcing her to place her hands on a large picture window in the outer room of the suite and spread her legs apart so he run his hands up her legs and under her dress without obstruction.
- 46. When Plaintiff resisted, Professor Harvey began shouting at Plaintiff in a loud and threatening manner that terrified Plaintiff and caused her to fear that Professor Harvey would physically harm her.
- 47. Plaintiff remained physically and mentally unable to summon help throughout the entire course of the evening.

- 48. Professor Harvey ordered Plaintiff to sit on a sofa in the outer room of the suite.
- Shortly thereafter, Plaintiff lost consciousness.
- 50. When she regained consciousness, Plaintiff discovered Professor Harvey on top of her, kissing Plaintiff and touching her breasts and genital area without her consent.
 - 51. Plaintiff lost consciousness.
- 52. When Plaintiff regained consciousness, Professor Harvey forced Plaintiff to stand and then he steered her into the bedroom, pushing her from behind.
 - 53. Plaintiff was terrified but unable to repel Professor Harvey physically.
 - 54. Once in the bedroom, Plaintiff lost consciousness.
- 55. When she regained consciousness, Plaintiff discovered Professor Harvey had removed articles of her clothing without her consent.
 - 56. Plaintiff lost consciousness.
- 57. When Plaintiff regained consciousness, Plaintiff discovered Professor Harvey was actively performing oral sex on her without her consent.
- 58. Plaintiff attempted to push herself away from Professor Harvey's reach, but was unable to stop him from continuing to sexually assault her.
 - 59. Plaintiff lost consciousness.
- 60. When she regained consciousness, Plaintiff discovered Professor Harvey was forcefully penetrating her vagina with either his finger or a foreign object, which caused Plaintiff considerable pain.
 - 61. Plaintiff lost consciousness.
- 62. When she regained consciousness, Plaintiff discovered Professor Harvey was actively kissing her while engaging in vaginal intercourse without her consent.

- 63. When Plaintiff objected to Professor Harvey engaging in vaginal intercourse without her consent, Professor Harvey became extremely angry with Plaintiff, causing her to fear he would physically harm her.
 - 64. Plaintiff lost consciousness.
- 65. During a prolonged period of unconsciousness, Plaintiff believes Professor

 Harvey raped her anally based on injuries received on May 15, 2018, the night of the sexual assault.
- 66. Plaintiff experienced period when she was conscious but unable to move of her own volition.
- 67. During some periods when Plaintiff was conscious but unable to move of her own volition, Professor Harvey dragged Plaintiff by her hands and feet in order to move her into various positions for sex acts he perpetrated on her without her consent.
- 68. Throughout the night of May 15, 2018, when physically and mentally able, Plaintiff repeatedly told Professor Harvey to "stop" when he was raping her.
- 69. Throughout the night of May 15, 2018, when physically and mentally able, Plaintiff repeatedly told Professor Harvey she "did not want this" [the sexual assault he was perpetrating].
- 70. Throughout the night of May 15, 2018, when physically and mentally able, Plaintiff repeatedly said, "No. No." to indicate to Professor Harvey she did not want him to continue raping her.
 - 71. Professor Harvey was undeterred by Plaintiff's entreaties that he stop raping her.
- 72. At approximately 1:00 a.m. on May 16, 2018, Professor Harvey approached Plaintiff with a glass containing an unknown substance.

- 73. Professor Harvey demanded Plaintiff drink the contents of the glass.
- 74. Plaintiff resisted, telling Professor Harvey she would not drink anything.
- 75. Professor Harvey became agitated and forcefully insisted Plaintiff drink from the glass.
- 76. Fearing that Professor Harvey would physically harm her if she did not drink from the glass, Plaintiff was forced to drink some of the unknown contents as Professor Harvey physical hovered over her menacingly.
- 77. Between 3:00 a.m. and 6:00 a.m., Plaintiff drifted in and out of consciousness while Professor Harvey apparently slept.
- 78. At 6:00 a.m., Plaintiff attempted to get up to leave, but Professor Harvey angrily ordered Plaintiff to remain in bed.
- 79. Plaintiff was fearful of Professor Harvey and so complied.
- 80. At approximately 8:00 a.m., Plaintiff attempted to gather her personal effects in order to leave Professor Harvey's hotel room.
- 81. Professor Harvey noticed Plaintiff trying to leave the bedroom and became noticeably agitated.
 - 82. Professor Harvey prevented Plaintiff from leaving and made her return to his bed.
 - 83. Plaintiff lost consciousness.
- 84. When she regained consciousness, Plaintiff discovered Professor Harvey actively engaging in vaginal intercourse without her consent.
- 85. When he concluded raping Plaintiff, Professor Harvey instructed Plaintiff that she could get dressed and leave.

- 86. Plaintiff was unable to unlock the hotel door without Professor Harvey's assistance.
- 87. When Professor Harvey assisted her with opening the door, Plaintiff immediately departed the room for her car, which was parked in the parking lot of Harrah's Hotel and Casino.
 - 88. Plaintiff reached her car at approximately 11:50 a.m. on May 16, 2018.
 - C. Retaliation Against Plaintiff by Professor Harvey For Plaintiff's Title IX Complaint
- 89. On May 23, 2018, Plaintiff reported to Temple University's Assistant Dean Deborah Feldman that she had been raped by Professor Harvey.
- 90. Assistant Dean Deborah Feldman responded, "I can't say I'm surprised," upon hearing that Professor Harvey had allegedly raped Plaintiff.
- 91. Assistant Dean Feldman then summoned other law school personnel, including Title IX Coordinator Andrea Seiss, to hear Plaintiff's statement regarding the alleged sexual assault perpetrated by Professor Harvey against her.
- 92. Ms. Seiss advised Plaintiff as to her right to file a formal Title IX complaint against Professor Harvey.
- 93. On May 23, 2018, Plaintiff elected to initiate a formal Title IX complaint against Professor Harvey.
- 94. Temple University hired outside counsel Renee N. Smith, Esquire of Montgomery, McCracken Walker & Rhoads LLP to conduct the Title IX investigation.
- 95. The Title IX investigation extended from August 2018, when Plaintiff and Professor Harvey made their initial statements to the independent investigator, until March 2019, when the parties were made aware of the investigation's findings.

- 96. On December 13, 2018, Plaintiff and Plaintiff's sister, Christy Stokes, approached Professor Harvey at The Rosenbach, where he was a guest speaker.
- 97. Following his presentation, Professor Harvey spoke with Plaintiff (with her sister nearby) and expressed his desire that Plaintiff withdraw her Title IX complaint at Temple University.
- 98. Professor Harvey told Plaintiff in a threatening manner that he had "played fair [with her] so far, but that did not have to continue."
- 99. At the time Plaintiff and Professor Harvey met in December 2018, Plaintiff had an application for admission to the Pennsylvania Bar under consideration with the Pennsylvania Board of Law Examiners.
- 100. Plaintiff had completed her application and had no reason to anticipate a problem with her candidacy, as Plaintiff had no criminal record, no driving infractions, good credit, and her juris doctorate degree.
- 101. Plaintiff had also satisfied all requests for documentation from the Pennsylvania Board of Law Examiners.
- 102. Plaintiff refused to withdraw her Title IX complaint against Professor Harvey upon his request in December 2018.
- 103. Plaintiff believes Professor Harvey contacted the Pennsylvania Board of Law Examiners and offered untrue, deliberately misleading, and unnecessarily derogatory information about Plaintiff to those who were reviewing Plaintiff's application for admission to the Pennsylvania Bar as an act of retaliation for Plaintiff's refusal to withdraw her Title IX complaint against Professor Harvey.
 - 104. Plaintiff took and passed the Pennsylvania Bar Exam in February 2019.

- 105. Plaintiff was subjected to a protracted investigation into her character and fitness after she received a passing score on the February 2019 Pennsylvania Bar Examination.
 - 106. Plaintiff was not admitted to the Pennsylvania Bar until December 5, 2019.

COUNT I NEGLIGENCE

- 107. Plaintiff hereby incorporates by reference the prior paragraphs of this Complaint as though fully set forth at length.
- 108. Professor Harvey, as a Professor at Temple University, had a duty to Plaintiff to provide educational services without discriminating against Plaintiff on account of her gender or any other protected class status she might have enjoyed while a student at Temple University.
- 109. Professor Harvey sexually harassed Plaintiff on account of her gender during her matriculation at Temple University.
 - 110. Professor Harvey breached his duty as an educator with respect to Plaintiff.
- 111. Professor Harvey had a duty to provide reasonable care to Plaintiff when he deliberately incapacitated her and held her in seclusion where Plaintiff could not seek help or receive assistance from others.
- 112. Professor Harvey breached his duty to treat Plaintiff with reasonable care when he deliberately secluded her from those who could potentially offer assistance.
- 113. As a result of Professor Harvey's acts, Plaintiff has been damaged and brings these civil claims for the physical, emotional, and psychological injuries she suffered.
- 114. Professor Harvey's acts were negligent or showed a reckless indifference to Plaintiff's rights, for which she is entitled to an award of compensatory and punitive damages.

COUNT II SEXUAL BATTERY (RAPE)

- 115. Plaintiff hereby incorporates by reference the prior paragraphs of this Complaint as though fully set forth at length.
 - 116. Professor Harvey engaged in sexual acts and sexual intercourse with Plaintiff.
- 117. The sexual acts and sexual intercourse that occurred between Professor Harvey and Plaintiff occurred without Plaintiff's consent.
- 118. As a result of Professor Harvey's acts, Plaintiff has been damaged and brings these civil claims for the physical, emotional, and psychological injuries she suffered.
- 119. Professor Harvey's acts were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Plaintiff's rights, for which she is entitled to an award of compensatory and punitive damages.

COUNT III ASSAULT

- 120. Plaintiff hereby incorporates by reference the prior paragraphs of this Complaint as though fully set forth at length.
- 121. Professor Harvey placed Plaintiff in fear of imminent bodily injury when he sexually assaulted her.
- 122. Professor Harvey placed Plaintiff in fear of imminent bodily injury when he became aggressive and refused to let her leave his hotel room after raping her.
- 123. By intentionally causing Plaintiff to fear imminent bodily injury, Professor Harvey assaulted Plaintiff.
- 124. As a result of Professor Harvey's acts, Plaintiff has been damaged and brings these civil claims for the physical, emotional, and psychological injuries she suffered.

125. Professor Harvey's acts were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Plaintiff's rights, for which she is entitled to an award of compensatory and punitive damages.

COUNT IV BATTERY

- 126. Plaintiff hereby incorporates by reference the prior paragraphs of this Complaint as though fully set forth at length.
 - 127. Professor Harvey dragged Plaintiff by her hands and feet without her consent.
- 128. Professor Harvey engaged in sexual acts and sexual intercourse that involved touching Plaintiff without her consent.
- 129. By intentionally making physical contact with Plaintiff without her consent,

 Professor Harvey committed a battery against Plaintiff.
- 130. As a result of Professor Harvey's acts, Plaintiff has been damaged and brings these civil claims for the physical, emotional, and psychological injuries she suffered.
- 131. Professor Harvey's acts were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Plaintiff's rights, for which she is entitled to an award of compensatory and punitive damages.

COUNT V FALSE IMPRISONMENT

- 132. Plaintiff hereby incorporates by reference the prior paragraphs of this Complaint as though fully set forth at length.
- 133. Professor Harvey restrained Plaintiff such that she could not voluntarily leave the county and professor that she could not voluntarily leave the room in which he sexually assaulted her.
 - 134. Plaintiff did not consent to Professor Harvey's restraint of her.

- 135. Professor Harvey had no legal right to detain Plaintiff at any time on May 15-16, 2018.
- 136. As a result of Professor Harvey's acts, Plaintiff has been damaged and brings these civil claims for the physical, emotional, and psychological injuries she suffered.
- 137. Professor Harvey's acts were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Plaintiff's rights, for which she is entitled to an award of compensatory and punitive damages.

COUNT VI INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

- 138. Plaintiff hereby incorporates by reference the prior paragraphs of this Complaint as though fully set forth at length.
- 139. Professor Harvey's conduct in sexually harassing Plaintiff from October 2014 to May 2018 while she was a student at Temple University was extreme and outrageous and caused Plaintiff to suffer severe physical, emotional, and psychological harm.
- 140. Professor Harvey's conduct in raping Plaintiff and otherwise sexually assaulting her in May 2018 as described above was extreme and outrageous and caused Plaintiff to suffer severe physical, emotional, and psychological harm.
- 141. As a result of Professor Harvey's acts, Plaintiff has been damaged and brings these civil claims for the physical, emotional, and psychological injuries she suffered.
- 142. Professor Harvey's acts were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Plaintiff's rights, for which she is entitled to an award of compensatory and punitive damages.

COUNT VII NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

- 143. Plaintiff hereby incorporates by reference the prior paragraphs of this Complaint as though fully set forth at length.
- 144. Professor Harvey's conduct in sexually harassing Plaintiff from October 2014 to May 2018 while she was a student at Temple University was extreme and outrageous and caused Plaintiff to suffer severe physical, emotional, and psychological harm.
- 145. Professor Harvey's conduct in raping Plaintiff and otherwise sexually assaulting her in May 2018 as described above was extreme and outrageous and caused Plaintiff to suffer severe physical, emotional, and psychological harm.
- 146. As a result of Professor Harvey's acts, Plaintiff has been damaged and brings these civil claims for the physical, emotional, and psychological injuries she suffered.
- Plaintiff's rights, for which she is entitled to an award of compensatory and punitive damages.

COUNT VIII DEFAMATION

- 148. Plaintiff hereby incorporates by reference the prior paragraphs of this Complaint as though fully set forth at length.
- 149. At all times relevant hereto, Plaintiff was a law-abiding citizen who enjoyed the respect, confidence, and esteem of her neighbors, classmates, and others in the community.
- 150. At no time has Plaintiff ever been adjudged guilty of any crime, offense, or violation of law that would tend to lessen the respect, confidence, and esteem of others that she enjoyed and to which she was entitled.
- 151. Plaintiff believes Professor Harvey made false statements regarding Plaintiff to the Pennsylvania Bar Examiners.

- 152. Plaintiff believes Professor Harvey made false statements to members of the Temple University community and others regarding Plaintiff.
- 153. As a result of Professor Harvey's acts, Plaintiff has been damaged and brings these civil claims for the physical, emotional, and psychological injuries she suffered.
- 154. Professor Harvey's acts were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Plaintiff's rights, for which she is entitled to an award of compensatory and punitive damages.

COUNT IX INVASION OF PRIVACY

- 155. Plaintiff hereby incorporates by reference the prior paragraphs of this Complaint

 C as though fully set forth at length.
- 156. The unwanted and offensive sexual assault of Plaintiff by Professor Harvey was an invasion of Plaintiff's physical solitude and privacy.
- 157. The unwanted and offensive sexual assault of Plaintiff by Professor Harvey gave unwanted publicity to Plaintiff's private life.
- 158. The derogatory and defamatory comments made by Professor Harvey to the Pennsylvania Bar Examiners placed Plaintiff in a false light.
- 159. As a result of Professor Harvey's acts, Plaintiff has been damaged and brings these civil claims for the physical, emotional, and psychological injuries she suffered
- 160. Professor Harvey's acts were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Plaintiff's rights, for which she is entitled to an award of compensatory and punitive damages.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court grant her relief against Defendant Hosea H. Harvey, III as follows:

- A. An award of damages to be determined at trial to compensate Plaintiff BethAnn Morrison for all non-monetary and compensatory harm, including, but not limited to, compensation for her physical injuries, pain and suffering, humiliation, embarrassment, stress, anxiety, loss of self-esteem and self-confidence, and emotional pain and suffering;
- B. An award of punitive damages in an amount to be determined at trial, sufficient to deter Defendant Hosea H. Harvey, III from engaging in future illegal and/or wrongful conduct;
 - C. Such other and further relief as the Court may deem just and proper.

Dated: January 26, 2021

Respectfully submitted,

Is/ BethAnn Morrison

BethAnn Morrison 121 Overhill Avenue Philadelphia, PA 19116 Phone: (215) 280-2353

Email: bethann.morrison.1@gmail.com

VERIFICATION

I, BethAnn Morrison, hereby verify that the statements made in the foregoing pleading are true and correct to the best of my information, knowledge, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to authorities.

Date: January 26, 2021

Is/ BethAnn Morrison

BethAnn Morrison

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: BethAnn Morrison

Signature: /s/ BethAnn Morrison

Name: BethAnn Morrison

Attorney No. (if applicable):

EXHIBIT B

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Filed and Att Office of Judici

FIRST JUDICIAL DISTRICT OF PENNSYLVANIA COURT OF COMMON PLEAS OF PHILADALPHIA

BETHANN MORRISON,

Plaintiff,

No. 00768

DECLARATION OF SERVICE

UNIVERSITY H. TEMPLE HOSEA and HARVEY, III

Vs.

Defendant(s),

1. I, MICHAEL W. GRAHAM, of Pierce County, State of Washington, do hereby certify under penalty of perjury under the laws of the state of Washington that the following is true and correct;

I am over eighteen years of age and competent to testify as to the matters herein; I received one copy of:

- Notice to Defendant
- Complaint Civil Action
- Verification
- Certificate of Compliance

Spanaway, Wa 98387 Case ID: 200500768

1	2. The documents listed above in Paragraph 1 - was served to : HOSEA H
2	HARVEY, III., documents were served upon:
3	a Defendant listed above.
4	MIRYAM HAPUEY (SPOUSE) a person of suitable age and discretion who
5	is a resident at the usual place of abode of the individual named above according to the RCW
6	4.28.080.
	3. Service took place on the 18th day of 18th 2021 at
7	the hour of 6:05 [p.m]/a.m., within the County of KILLS,
8	State of Washington, the following address:
9	256 E. ROANOKE ST, SEATTLE, WA 98102
10	
11	DATED this 13th day of NAY 2021
12	Signature: Messaglu Galiau
13	Michael W. Graham Registered Process Server
14	License #: 12657 KKWT Process Services
	P.O. Box 4623 Spanaway, WA 98387
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DECLARATION OF SERVICE

PAGE 2

KKWT PROCESS SERVICES.

P.O. Box 4623 Spanaway, Wa 98387 (253)565-6670

EXHIBIT C





A \$5 Convenience fee will be added to the transaction at checkout.

Case Description

Case ID: 200500768

Case Caption: MORRISON VS TEMPLE UNIVERSITY ETAL

Filing Date: Wednesday, May 13th, 2020
Court: MAJOR JURY-EXPEDITED

Location: City Hall **Jury:** JURY

Case Type: MISC SUMMONS

Status: LISTED FOR CASE MGMT CONF

Related Cases

No related cases were found.

Case Event Schedule

Event	Date/Time	Room	Location	Judge
CASE MANAGEMENT	22-JUN-2021	City	Case Management Center,	unassigned
CONFERENCE	09:00 AM	Hall	Rm 613	

Case motions

No case motions were found.

Case Parties

Seq#		Assoc	Expn Date	Туре	Name		
1				PRO SE FILER	MORRISON, BETHANN		
Address:	121 OVERHILL AVENUE PHILADELPHIA PA 19116 (215)280-2353		Aliases:	s: none			
2	2 1 PLAINTIFF MORRISON BETHANN				MORRISON, BETHANN		
Address:	121 OVERHILL AVENUE PHILADELPHIA PA 19116		Aliases:	none			

)/2021	Case 2:21-cv-02616 Document	Divid Dolcklet R	eඛ෯/09/21 Page 28 o	f 3 8
3	6	04-FEB- 2021	DEFENDANT	TEMPLE UNIVERSITY
Address:	OFFICE OF UNIVERSITY COUNSEL 300 SULLIVAN HALL 1330 W. POLETT WALK PHILADELPHIA PA 19122	Aliases:	none	
4			DEFENDANT	HARVEY III, HOSEA H
Address:	939 WESTLAKE AVENUE N SEATTLE WA 98109	Aliases:	none	
5			TEAM LEADER	NEW, ARNOLD L
Address:	606 CITY HALL PHILADELPHIA PA 19107 (215)686-7260	Aliases:	none	
6		04-FEB- 2021	ATTORNEY FOR DEFENDANT	HAMBURG, NEIL J
Address:	HAMBURG LAW GROUP, PLLC 1 FRANKLIN TOWN BLVD STE. 1106 PHILADELPHIA PA 19103 (215)858-2225 hamburgnj@hamburglawgroup.com	Aliases:	none	
7	6	04-FEB- 2021	ATTORNEY FOR DEFENDANT	PATEL, ALPA
Address:	HAMBURG LAW GROUP, PLLC 1 FRANKLIN TOWN BLVD SUITE 1106 PHILADELPHIA PA 19103 (812)240-9674 patela@hamburglawgroup.com	Aliases:	none	

Docket Entries

13-MAY-2020 ACTIVE CASE 14-MAY-20	Filing Date/Time	Docket Type	Filing Party	Disposition Amount	Approval/ Entry Date
02:11 PM 09:17 AM		ACTIVE CASE			14-MAY-2020 09:17 AM

Docket Entry:	E-Filing Number: 2005016361				
13-MAY-2020 02:11 PM	COMMENCEMENT CIVIL ACTION JURY		14-MAY-2020 09:17 AM		
Documents:	Click link(s) to preview/purchase the Final Cover	Click HERE to pu	rchase all documents e docket entry		
Docket Entry:	none.				
13-MAY-2020 02:11 PM	PRAE TO ISSUE WRIT OF SUMMONS		14-MAY-2020 09:17 AM		
Documents:				Click HERE to purchase all document related to this one docket entry	
Docket Entry:	PRAECIPE TO ISSUE WRIT (ISSUED.	D. WRIT OF SUM	MONS		
		MORRISON,	1	1	
13-MAY-2020 02:11 PM	JURY TRIAL PERFECTED		14-MAY-2020 09:17 AM		
Docket Entry:	12 JURORS REQUESTED.				
42 MAN/ 2020	WAITING TO LIST CASE	MODDICON		44 MAN 2020	
13-MAY-2020 02:11 PM	WAITING TO LIST CASE MGMT CONF	MORRISON, BETHANN		14-MAY-2020 09:17 AM	
Docket Entry:	none.				
22-JUN-2020 03:51 PM	ENTRY OF APPEARANCE		23-JUN-2020 09:42 AM		
Documents:	Click link(s) to preview/purchase the entry of appearance - NJH and AP.po	Click HERE to pu	rchase all documents e docket entry		
Docket Entry:	ENTRY OF APPEARANCE OF TEMPORE OF	NEIL J HAMBURO	G FILED.		
01-JUL-2020 01:46 PM	PRAECIPE TO REISSUE SUMMONS	MORRISON, BETHANN		01-JUL-2020 01:46 PM	
Documents:	Click link(s) to preview/purchase the documents Praecipe to Reinstate.pdf Morrison-May Term 2020-000768-Writ for Reinstatement.pdf				

Docket Entry:	PREACIPE TO REISSUE WRIT OF SUMMONS FILED. WRIT REISSUED. (FILED ON BEHALF OF BETHANN MORRISON)					
09-OCT-2020 12:10 PM						
Docket Entry:	1000					
13-OCT-2020 12:30 AM	NOTICE GIVEN			13-OCT-2020 12:30 AM		
Docket Entry:	\parallel none					
17-OCT-2020 PRAECIPE TO REISSUE MORRISON, BETHANN 19-OCT-2020 PRAECIPE TO REISSUE MORRISON, BETHANN 07:30 A						
Documents:	Click link(s) to preview/purchase the documents Praecipe to Reinstate 10-17-2020 May Term 2020 No 000768.pdf Writ of Summons-Reinstated-Timestamped.pdf					
Docket Entry:	Docket PREACIPE TO REISSUE WRIT OF SUMMONS FILED. WRIT REISSUED. (FILE					
1		Г	1	Г		
19-OCT-2020 10:41 AM	ACCEPTANCE OF SERVICE FILED	PATEL, ALPA		19-OCT-2020 12:45 PM		
Documents:	Click link(s) to preview/purchase the 09 acceptance of service.pdf	documents	Click HERE to pur	rchase all documents docket entry		
Docket Entry:						
19-OCT-2020 01:08 PM	CASE RESCHEDULED BY COURT	ITALIANO, THERESA		19-OCT-2020 01:08 PM		
	CASE MANAGEMENT ORDER REQUEST.	ISSUANCE DATE	CONTINUED PEF	RJOINT		
19-OCT-2020 01:11 PM	LISTED FOR CASE MGMT CONF			19-OCT-2020 01:11 PM		
Docket Entry: none.						
Entry:	none.					

S/9/2021 Case 2:21-cv-02616 Document 2:10 Document 2:10 Document 12:10 Document 1							
19-OCT-2020 01:11 PM	NOTICE GIVEN			19-OCT-2020 01:11 PM			
Documents:	Click link(s) to preview/purchase the documents NOTGV_14.pdf Click HERE to purchase all documents related to this one docket entry						
Docket Entry:	none.						
19-OCT-2020 01:11 PM	NOTICE GIVEN UNDER 20-OCT-2020 RULE 236 20-OCT-2020						
Docket Entry:	NOTICE GIVEN ON 20-OCT-2020 OF NOTICE GIVEN ENTERED ON 19-OCT-2020.						
21-OCT-2020 12:30 AM	NOTICE GIVEN 21-OCT-2020 12:30 AM						
Docket Entry:	none.						
23-NOV-2020 04:54 PM	CASE RESCHEDULED BY ORVIK, ERIK 23-NOV-202 04:54 PM						
Docket Entry:	PLAINTIFF TO FILE COMPLAINT.						
23-NOV-2020 04:56 PM	LISTED FOR CASE MGMT 23-NOV-202 O4:56 PM						
Docket Entry:	none.						
23-NOV-2020 04:56 PM	NOTICE GIVEN 23-NOV-204:56 PM						
Documents:	Click link(s) to preview/purchase the documents NOTGV_19.pdf Click HERE to purchase all documents related to this one docket entry						
Docket Entry:	Docket Entry: THE CASE MANAGEMENT CONFERENCE FOR THE ABOVE CAPTIONED MATTER HAS BEEN RESCHEDULED FOR Wednesday, December 30, 2020, AT 09:00 AM, IN Case Management Center, Rm 613, CITY HALL. NO FURTHER CONTINUANCES WILL BE GRANTED ABSENT EXIGENT CRCUMSTANCES. COUNSEL FOR PLAINTIFF IS DIRECTED TO SERVE A COPY OF THIS NOTICE ON ANY UNREPRESENTED PARTY AND ANY ATTORNEY ENTERING AN APPEARANCE SUBSEQUENT TO THE ISSUANCE OF THIS NOTICE. COUNSE MUST BE PREPARED TO ADDRESS ALL RELEVANT ISSUES. IF THE CASE SETTLED PRIOR TO THE CONFERENCE, ELECTRONICALLY FILE A SETTLEMENT LETTER. TO FILE THE LETTER ELECTRONICALLY, ACCESS TH						

"EXISTING CASE" SECTION OF THE COURT'S ELECTRONIC FILING SYSTEM. SELECT "CONFERENCE SUBMISSIONS" AS THE FILING CATEGORY. SELECT "SETTLEMENT LETTER" AS THE DOCUMENT TYPE. QUESTIONS CONCERNING THIS NOTICE AND ITS CONTENTS SHALL BE REFERRED TO 215-686-3710.

	215-686-3710.					
23-NOV-2020 04:56 PM	NOTICE GIVEN UNDER RULE 236			25-NOV-2020 10:55 AM		
Docket Entry:	NOTICE GIVEN ON 25-NOV-2020 OF NOTICE GIVEN ENTERED ON 23-NOV-2020.					
25-NOV-2020 12:30 AM	NOTICE GIVEN			25-NOV-2020 12:30 AM		
Docket Entry:	none.					
30-DEC-2020 WAITING TO LIST RULE ORVIK, ERIK 30-DEC-20 10:37 AM DATE 0RVIK, ERIK 10:38 AM						
	Docket APL. FAILED TO FILE COMPLAINT AFTER MULTIPLE LISTINGS FOR CASE Entry: MANAGEMENT REVIEW.					
05-JAN-2021 12:49 PM	RULE ISSUED	NEW, ARNOLD L		05-JAN-2021 12:00 AM		
Documents:	Click link(s) to preview/purchase the documents RLFIS_23.pdf Click HERE to purchase all document related to this one docket entry					
a rule is hereby issued to show cause why this matter should not be non-prossed failure to file a complaint in a timely manner. Rule Returnable via Virtual Courtroom video-conference on January 27th, 2021 at 10:00 a.m. All counsel and unrepresented parties shall appear via video-conference unless the case is settled withdrawn, or a complaint is filed. If this case is settled, withdrawn, or a complaint is filed, counsel must notify the court immediately in writing and upon proper notification, the Rule will automatically be dissolved. IT IS FURTHER ORDERED at follows: SEE ORDER FOR COMPLETE TERMSBY THE COURT: NEW, JUDG 01/05/2021						
05-JAN-2021 12:49 PM	NOTICE GIVEN UNDER RULE 236			05-JAN-2021 01:53 PM		
Docket Entry:	NOTICE GIVEN ON 05-JAN-20	21 OF RULE ISSUE	ED ENTERED ON	05-JAN-2021.		
05-JAN-2021 LISTED RULE RETURNABLE 05-JAN-2021 12:52 PM 12:52 PM						

0/2021 Case 2:21-cv-02616 Document Divid Deckletelephon/09/21 Page 33 of 38						
Docket Entry:	Docket none. Entry:					
11-JAN-2021 10:10 AM	STIPULATION FILED	HAMBURG, NEIL J		11-JAN-2021 10:38 AM		
Documents:	Click link(s) to preview/purchase the documents Final Fully Executed Stipulation of Dismissal.pdf Click HERE to purchase all documents related to this one docket entry					
Docket Entry:						
11-JAN-2021 STIPULATION ASSIGNED 11-JAN-2 12:18 PM						
Docket Entry:	21-21010721 STIPULATION FI DATE: JANUARY 11, 2021	LED ASSIGNED TO) JUDGE: NEW, A	RNOLD L. ON		
27-JAN-2021 ORDER ENTERED/236 NEW, ARNOLD L NOTICE GIVEN				27-JAN-2021 12:00 AM		
Documents:	Click link(s) to preview/purchase the documents ORDER_28.pdf Click HERE to purchase all document related to this one docket entry					
IT IS HEREBY ORDERED AND DECREED THE RULE, LISTED FOR 27TH OF JANUARY, 2021 IS DISSOLVED. THE CASE MANAGEMENT ORDER ISSUAN DATE FOR THE ABOVE CAPTIONED MATTER HAS BEEN RESCHEDULED FOR THE BRUARY 22ND, 2021, AFTER WHICH A CASE MANAGEMENT ORDER WISE BE ISSUED BY A CIVIL CASE MANAGER SUBSEQUENT TO A REVIEW OF TO ELECTRONIC COURT RECORD, CIVIL DOCKET AND CASE MANAGEMENT MEMORANDA. ATTENDANCE BY ALL COUNSEL OF RECORD AND UNREPRESENTED PARTIES IS WAIVED. NO CASE MANAGEMENT CONFERENCE WILL BE HELD IN CITY HALLBY THE COURT: NEW, JUDG 01/27/2021						
27-JAN-2021 11:49 AM	NOTICE GIVEN UNDER RULE 236			27-JAN-2021 04:42 PM		
Docket NOTICE GIVEN ON 27-JAN-2021 OF ORDER ENTERED/236 NOTICE GIVEN Entry: ENTERED ON 27-JAN-2021.						
27-JAN-2021 11:50 AM	WAITING TO LIST CASE MGMT CONF	NEW, ARNOLD L		27-JAN-2021 11:50 AM		
Docket Entry:	none.		II.			

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